

Marcus A. Helt (TX 24052187)  
C. Ashley Ellis (TX 00794824)  
FOLEY GARDERE  
FOLEY & LARDNER LLP  
2021 McKinney Avenue, Suite 1600  
Dallas, TX 75201  
Telephone: 214.999.3000  
Facsimile: 214.999.4667

PROPOSED COUNSEL TO DEBTORS REAGOR-DYKES MOTORS, LP *et al.*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

<b>IN RE:</b>	§	
	§	
<b>REAGOR-DYKES MOTORS, LP, <i>et al.</i><sup>1</sup></b>	§	<b>Case No. 18-50214-rlj-11</b>
	§	<b>Jointly Administered</b>
<b>Debtor.</b>	§	

---

**NOTICE OF AGENDA FOR HEARING  
SCHEDULED FOR AUGUST 30, 2018, AT 9:00 A.M. BEFORE THE HONORABLE  
ROBERT L. JONES AT THE UNITED STATES BANKRUPTCY COURT, LOCATED  
AT 1205 TEXAS AVE., RM 306, LUBBOCK, TEXAS 79401**

**This agenda sets forth items in the order the Debtors intend to present to the Court.  
The Status of each is set forth below.**

- 1.** *Application to Employ BlackBriar Advisors, LLC as Other Professional (Chief Restructuring Officer) (Emergency)* [Docket No. 38]
  - a. *Objection of the United States Trustee to Debtor's-in-Possession Emergency Joint Application to Employ Chief Restructuring Officer* [Docket No. 71]; and
  - b. *Objection of Ford Motor Credit Company LLC to Debtor's Emergency Joint Application to Employ Chief Restructuring Officer* [Docket No. 81].

**Status:** Docket No. 71 will be withdrawn. Docket No. 81 will go forward.

---

<sup>1</sup> The Debtors are Reagor-Dykes Imports, LP (Case No. 18-50215), Reagor-Dykes Amarillo (Case No. 18-50216), Reagor-Dykes Auto Company, LP (Case No. 18-50217), Reagor-Dykes Plainview, LP (Case No. 18-50218), and Reagor-Dykes Floydada, LP (Case No. 18-50219).

2. *Motion for Relief from Stay Automatic and Request for Shortened Notice and Expedited Hearing* [Docket No. 46] filed by Ford Motor Credit Company, LLC.

**Status:** This matter is tied to the cash-collateral motion. If an agreement is reached on the cash-collateral motion, this Motion will be passed to September 18, 2018.

3. *Motion to Appoint Chapter 11 Trustee and Request for Shortened Notice and Expedited Hearing* [Docket No. 47] filed by Ford Motor Credit Company, LLC.

**Status:** This matter will be passed to September 19, 2018.

4. *Motion for Relief from Stay* [Docket No. 82] filed by Manheim Remarketing, Inc. and Online Vehicle Exchange, LLC.

**Status:** This matter will be passed to September 19, 2018.

5. *Motion to Intervene in the Motion for Relief from Stay by Manheim* [Docket No. 97] filed by Midland Capital Appraisal District and Floyd Central Appraisal District.

**Status:** This matter will be passed to September 19, 2018.

6. *Motion to Use Cash Collateral (Emergency)* [Docket No. 8] filed by the Debtors.

**Status:** The parties are currently negotiating an extension of the budget period. But they have not yet reached an agreement. The parties will update the Court as soon as possible.

7. *Motion to Intervene in the Motion for Relief from Stay by Ford Motor Credit Company, LLC* [Docket No. 98] filed by Midland Central Appraisal District and Floyd Central Appraisal District.

**Status:** This matter will be passed to September 19, 2018.

8. *Motion to Intervene in the Motion for Relief from Stay by Manheim* [Docket No. 101] filed by Midland County.

**Status:** This matter will be passed to September 19, 2018.

9. *Motion to Intervene in the Motion for Relief from Stay by Ford Motor Credit Company, LLC* [Docket No. 102] filed by Midland County.

**Status:** This matter will be passed to September 18, 2018.

10. *Motion to Employ Mullin Hoard & Brown LLP, Nunc Pro Tunc, as Counsel for Debtors from August 1, 2018, through August 21, 2018, and to Withdraw as Counsel for the Debtors* [Docket No. 159].

**Status:** This matter will go forward.

The Debtors reserve the right to amend this Notice of Agenda as appropriate.

**NOTICE**

The pleadings in these cases and supporting papers are available on the Court's website at: [ecf.txnb.uscourts.gov](http://ecf.txnb.uscourts.gov). You may also request a copy of any pleading from counsel for the Debtors at the following address: Foley Gardere, Foley & Lardner LLP, 2021 McKinney Avenue, Suite 1600, Dallas, Texas 75201 ([acordero@foley.com](mailto:acordero@foley.com)).

DATED: August 28, 2018

Respectfully submitted by:

Marcus A. Helt  
Marcus A. Helt (TX 24052187)  
C. Ashley Ellis (TX 00794824)  
FOLEY GARDERE  
FOLEY & LARDNER LLP  
2021 McKinney Avenue, Suite 1600  
Dallas, TX 75201  
Telephone: 214.999.3000  
Facsimile: 214.999.4667

PROPOSED COUNSEL TO DEBTORS  
REAGOR-DYKES MOTORS, LP *et al.*